

### Part 3: Head and Neck VCA Transplant Program

**Table 1: OPTN Staffing Report**

<b>Member Code:</b>	<b>Name of Transplant Hospital:</b>	
<b>Main Program Phone Number:</b>	<b>Main Program Fax Number:</b>	<b>Hospital URL:</b> <a href="http://www">http://www</a>
<b>Toll Free Phone Number for Patients:</b>	<b>Hospital Number:</b>	

Refer to the staffing audit sent with this application and complete the table below for staff that are not captured on the staffing audit or to update information for current staff, including deleting (DEL) an individual. If you did not receive an audit with this application, complete the entire staffing report. Add additional rows as necessary. Make sure to use individuals' full, legal names (middle name/initial also included when possible) to prevent duplicate entries within the UNOS Membership Database and UNet.

Identify the **transplant program medical and/or surgical director(s)** .

<b>DE L</b>	<b>Name</b>	<b>Address</b>	<b>Phone</b>	<b>Fax</b>	<b>Email</b>

Identify the **primary surgeon and additional surgeon(s)** who perform transplants for the program.

<b>DE L</b>	<b>Name</b>	<b>Address</b>	<b>Phone</b>	<b>Fax</b>	<b>Email</b>

Identify **other surgeon(s)** who perform transplants for the program.

<b>DE L</b>	<b>Name</b>	<b>Address</b>	<b>Phone</b>	<b>Fax</b>	<b>Email</b>

Identify the **primary physician and additional physicians** (internists) who participate in this transplant program.

DE L	Name	Address	Phone	Fax	Email

Identify **other physicians** (internists) who participate in this transplant program.

DE L	Name	Address	Phone	Fax	Email

Identify the **transplant program administrator(s)/hospital administrative director(s)/manager(s)** who will be involved with this program. The \* denotes the primary transplant administrator.

DE L	Name	Address	Phone	Fax	Email
	*				

Identify the **clinical transplant coordinator(s)** who will be involved in this transplant program.

DE L	Name	Address	Phone	Fax	Email

Identify the **data coordinator(s)** who will be involved in this transplant program. The \* denotes the primary data coordinator.

DE L	Name	Address	Phone	Fax	Email
	*				

Identify the **social worker(s)** who will be involved with this program.

DE L	Name	Address	Phone	Fax	Email

Identify the **pharmacist(s)** who will be involved with this program.

DE L	Name	Address	Phone	Fax	Email

Identify the **financial counselor(s)** who will be involved with this program.

DE L	Name	Address	Phone	Fax	Email

Identify the **anesthesiologists** who will be involved with this program. The \* denotes the director of anesthesiology.

DE L	Name	Address	Phone	Fax	Email
	*				

Identify the **QAPI team members** who will be involved with this program.

DE L	Name	Address	Phone	Fax	Email

Identify **any other transplant staff** who will be involved with this program .

DE L	Name	Title	Address	Phone	Fax	Email

**Part 3A: Personnel - Head and Neck VCA Transplant Program Director(s)**

Identify the transplant program surgical and/or medical director(s) of the head and neck VCA transplant program and submit a C.V. for each program director. Briefly describe the leadership responsibilities for each individual.

<b>Name</b>	<b>Date of Appointment</b>	<b>Primary Areas of Responsibility</b>

**Part 3B, Section 1: Personnel - Primary Head and Neck VCA Transplant Surgeon**

1. Identify the primary head and neck VCA transplant surgeon:

Name:

a) Date of employment at this hospital.

Provide the following dates (use MM/DD/YY):

b) Explain the individual’s current credentialing status, including any limitations on practice:

c) How much of the surgeon’s professional time is spent on site at this hospital?

Percentage of professional time on site:
Number of hours per week:

d) How much of the surgeon’s professional time is spent on site at other facilities (hospitals, health care facilities, and medical group practices)?

Facility Name	Type	Location (City, State)	% Professional Time On Site

e) List the surgeon’s current board certification(s) below. If board certification is pending, indicate the date the exam has been scheduled. If individual has been recertified, use that date, also provide a copy of certification(s).

Certification Type	Certificate Effective Date (MM/DD/YY)	Certificate Valid Through Date (MM/DD/YY)	Certification Number

f) **Check which membership criteria the primary VCA transplant surgeon will use to qualify. Complete steps within the criteria box selected.**

<b>Membership Criteria</b>	<b>Check One</b>														
<p>A. Completion of a fellowship program in otolaryngology, plastic, oral and maxillofacial, or craniofacial surgery that is approved by the MPSC. Any ACGME-approved fellowship program is automatically accepted by the MPSC.</p> <p>Fellowship Hospital: _____ Dates: _____                      Fellowship Program Director: _____ Medical or Surgical Specialty: _____</p>															
<p>B. Completion of a fellowship program in otolaryngology, plastic, oral and maxillofacial, or craniofacial surgery that meets criteria in below:</p> <p>Fellowship Hospital: _____ Dates: _____                      Fellowship Program Director: _____ Medical or Surgical Specialty: _____</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <tr> <td style="padding: 2px;">Verify the otolaryngology, plastic, oral, maxillofacial, craniofacial surgery fellowship program meets the following:</td> <td style="text-align: center; width: 50px;">Y/N</td> </tr> <tr> <td style="padding: 2px;">i. The program is at a hospital that has inpatient facilities, operative suites and diagnostic treatment facilities, outpatient facilities, and educational resources.</td> <td></td> </tr> <tr> <td style="padding: 2px;">ii. The program is at an institution that has a proven commitment to graduate medical education.</td> <td></td> </tr> <tr> <td style="padding: 2px;">iii. The program director must have current certification in the sub-specialty by the American Board of Plastic Surgery, the American Board of Otolaryngology, American Board of Oral and Maxillofacial Surgery.</td> <td></td> </tr> <tr> <td style="padding: 2px;">iv. The program should have at least two physician faculty members with head and neck surgery experience and current medical licensure who are actively involved in the instruction and supervision of fellows during the time of accredited education.</td> <td></td> </tr> <tr> <td style="padding: 2px;">v. The program is at a hospital that has affiliated rehabilitation medicine services.</td> <td></td> </tr> <tr> <td style="padding: 2px;">vi. The program has the resources, including adequate clinical facilities, laboratory research facilities, and appropriately trained faculty and staff, to provide research experience.</td> <td></td> </tr> </table>	Verify the otolaryngology, plastic, oral, maxillofacial, craniofacial surgery fellowship program meets the following:	Y/N	i. The program is at a hospital that has inpatient facilities, operative suites and diagnostic treatment facilities, outpatient facilities, and educational resources.		ii. The program is at an institution that has a proven commitment to graduate medical education.		iii. The program director must have current certification in the sub-specialty by the American Board of Plastic Surgery, the American Board of Otolaryngology, American Board of Oral and Maxillofacial Surgery.		iv. The program should have at least two physician faculty members with head and neck surgery experience and current medical licensure who are actively involved in the instruction and supervision of fellows during the time of accredited education.		v. The program is at a hospital that has affiliated rehabilitation medicine services.		vi. The program has the resources, including adequate clinical facilities, laboratory research facilities, and appropriately trained faculty and staff, to provide research experience.		
Verify the otolaryngology, plastic, oral, maxillofacial, craniofacial surgery fellowship program meets the following:	Y/N														
i. The program is at a hospital that has inpatient facilities, operative suites and diagnostic treatment facilities, outpatient facilities, and educational resources.															
ii. The program is at an institution that has a proven commitment to graduate medical education.															
iii. The program director must have current certification in the sub-specialty by the American Board of Plastic Surgery, the American Board of Otolaryngology, American Board of Oral and Maxillofacial Surgery.															
iv. The program should have at least two physician faculty members with head and neck surgery experience and current medical licensure who are actively involved in the instruction and supervision of fellows during the time of accredited education.															
v. The program is at a hospital that has affiliated rehabilitation medicine services.															
vi. The program has the resources, including adequate clinical facilities, laboratory research facilities, and appropriately trained faculty and staff, to provide research experience.															
<p>C. The surgeon must have at least 2 years of consecutive and independent practice of head and neck surgery. The surgeon must have completed at least 1 face transplant as primary surgeon or first-assistant (document in Table 3), or a minimum number of head and neck procedures below as the primary surgeon (document in Tables 4 and 5):</p> <p>10 Facial trauma with bone fixation                      10 Head or neck free tissue reconstruction</p>															



**Table 2: Relevant Clinical Experience Log (Sample)**

The proposed primary surgeon must have observed at least two multi-organ procurements. Document those in the first table below. Only complete the remainder of this log if the surgeon is applying without board certification or is not providing letters of recommendation requesting an exception and a plan for continuing education in lieu of American or Canadian Boards.

<b>Organ:</b>	Head and Neck VCA
<b>Name of proposed primary surgeon:</b>	

**Multi-organ Procurements Observed**

#	Date of Procurement	Medical Record/ OPTN ID #	Role of Surgeon	Multi-organs
1				
2				
3				

**Pre-operative Evaluations of Head and Neck Transplant Patients**

#	Date of Evaluation	Medical Record/ OPTN ID #	Procedure	Hospital
1				
2				
3				
4				
5				

**VCA Head and Neck Transplants**

#	Date of Procedure	Medical Record/ OPTN ID #	Role of Surgeon	Hospital
1				
2				

**One Year Post-operative Follow-up of Head and Neck Recipient**

#	Date of Procedure	Medical Record/ OPTN ID #	Procedure	Hospital
1				
2				



**Table 3: Primary VCA Head and Neck Surgeon - Face Transplant Log**  
 (Sample)

<b>Organ:</b>	Head and Neck VCA
<b>Name of proposed primary surgeon:</b>	
<b>Date range of surgeon's appointment/training:</b> MM/DD/YY to MM/DD/YY	

List cases in date order. Add rows as needed. Patient ID should not be name or Social Security Number.

#	Date of Transplant	Location	Medical Record/ OPTN ID #	As Primary Surgeon (check as applicable)	Pre-Operative	Post-Operative 90 days
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16						
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30						

<b>Director's Signature</b>	<b>Date</b>
<b>Print Name</b>	

**Table 4: Primary Head and Neck VCA Surgeon - Facial Trauma with Bone Fixation Log** (Sample)

<b>Organ:</b>	Head and Neck VCA
<b>Name of proposed primary surgeon:</b>	
<b>Date range of surgeon's appointment/training:</b> MM/DD/YY to MM/DD/YY	

List cases in date order. Add rows as needed. Patient ID should not be name or Social Security Number.

#	Date of Procedure	Location	Medical Record/ OPTN ID #	As Primary Surgeon (check as applicabl e)	Pre- Operativ e	Post- Operative 90 days
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16						
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19						
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2						
6						
2						
7						
2						
8						
2						
9						
3						
0						

<b>Director's Signature</b>	<b>Date</b>
<b>Print Name</b>	

**Table 5: Primary VCA Head and Neck Surgeon - Head or Neck Free Tissue Reconstruction Log (Sample)**

<b>Organ:</b>	Head and Neck VCA
<b>Name of proposed primary surgeon:</b>	
<b>Date range of surgeon's appointment/training:</b> MM/DD/YY to MM/DD/YY	

List cases in date order. Add rows as needed. Patient ID should not be name or Social Security Number.

#	Date of Procedure	Location	Medical Record/ OPTN ID #	As Primary Surgeon (check as applicable)	Pre-Operative	Post-Operative 90 days
1						
2						
3						
4						
5						
6						

7						
8						
9						
1						
0						
1						
1						
1						
2						
1						
3						
1						
4						
1						
5						
1						
6						
1						
7						
1						
8						
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5						
2						
6						
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8						
2						
9						
3						
0						

<b>Director's Signature</b>	<b>Date</b>
<b>Print Name</b>	

**Part 3B, Section 2: Personnel - Additional Surgeon(s)**

**Complete this section of the application to describe surgeons involved in the program that are not designated as primary, but are credentialed by the transplant hospital to provide transplant services and independently manage the care of transplant patients, including performing the transplant operations and organ procurement procedures. Duplicate this section as needed.**

1. Identify the additional transplant surgeon:

Name:

a) Provide the following dates (use MM/DD/YY):

Date of employment at this hospital:

b) Does the surgeon have FULL privileges at this hospital?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

If the surgeon does **not** currently have full privileges:

Date full privileges to be granted (MM/DD/YY):   
 Explain the individual's current credentialing status, including any limitations on practice:

c) How much of the surgeon's professional time is spent on site at this hospital?

Percentage of professional time on site:   
 Number of hours per week:

d) How much of the surgeon's professional time is spent on site at other facilities (hospitals, health care facilities, and medical group practices)?

Facility Name	Type	Location (City, State)	% Professional Time On Site

e) List the surgeon's current board certification(s) below. If board certification is pending, indicate the date the exam has been scheduled. If the surgeon has been recertified, use that date.

Board Certification Type	Certification Effective Date/ Recertification Date (MM/DD/YY)	Certification Valid Through Date (MM/DD/YY)	Certificate Number

**Part 3C, Section 1: Personnel - Primary Head and Neck VCA Transplant Physician**

1. Identify the primary transplant physician:

Name:

**Check which membership criteria the primary VCA physician will use to qualify. Next steps are within the criteria box selected.**

Membership Criteria	Check One
(1) Currently designated as the primary transplant surgeon or primary transplant physician at an active solid organ transplant program. o Which solid organ transplant program? _____ o Proceed to Table 10, Certificate of Investigation.	
(2) Meets the requirements of a primary transplant surgeon or primary transplant physician in the OPTN Bylaws. o Which solid organ transplant program? _____ o Complete the rest of the application.	
(3) Meets the requirements found in Appendix J.2.  Fellowship Hospital: _____ Dates: _____ Fellowship Program Director: _____ Medical or Surgical Specialty: _____  _____ o Complete 1a) - e) below.	

a) Provide the following dates (use MM/DD/YY):

Date of employment at this hospital:
Date assumed role of primary physician:

b) Does the physician have FULL privileges at this hospital? (check one)

Yes	
No	

If the physician does **not** currently have full privileges:

Date full privileges to be granted (MM/DD/YY):
Explain the physician's current credentialing status, including any limitations on practice:

c) How much of the physician's professional time is spent on site at this hospital?

Percentage of professional time on site:
Number of hours per week:

d) How much of the physician's professional time is spent on site at other facilities (hospitals, health care facilities, and medical group practices)?

Facility Name	Type	Location (City, State)	% Professional Time On Site

e) List the physician's current board certification(s) below. If board certification is pending, indicate the date the exam has been scheduled. If the physician has been recertified, use that date, also provide a copy of the certification(s). If the physician does not have current American or Canadian board certification, provide letters of recommendation requesting this exception and provide the plan for continuing education as described in the OPTN Bylaws.

Board Certification Type	Certification Effective Date/ Recertification Date (MM/DD/YY)	Certification Valid Through Date (MM/DD/YY)	Certificate Number

Answer if qualifying by the primary intestine physician requirements:  
 If the physician is not a pediatric gastroenterologist and the program serves predominately pediatric patients, please identify a pediatric gastroenterologist who will be involved in the care of transplant recipients. Provide C.V.

Name	Board Certification	% Professional Time on Site

- f) Check the pathway through which the primary VCA transplant physician will be proposed. Refer to the Appendices E-I in the OPTN Bylaws for the necessary qualifications and more specific descriptions of the required supporting documents.

<b>Membership Criteria</b>	<b>Check one</b>
Residency Pathway	
Transplant Fellowship Pathway	
Pediatric Fellowship Pathway	
Combined Pediatric Training and Experience Pathway	
Clinical Experience Pathway	
Full (Intestine only)	
Conditional (Intestine only)	

- g) Transplant Experience (Post Fellowship) and Training (Fellowship): List the name(s) of the transplant hospital(s), applicable dates, and program director name(s) from either fellowship training or experience post fellowship. If a surgeon is being proposed to serve as the primary physician, also document the number of transplants and procurements performed. If a physician, document the number of patients that were provided substantive patient care (pre-, peri- and post-operatively from the time of transplant).

<b>Training and Experience</b>	<b>Date (MM/DD/YY)</b>		<b>Transplant Hospital</b>	<b>Program Director</b>	<b># Transplants as Primary or 1<sup>st</sup> Assist (Surgeon)</b>	<b># Procured as Primary or 1<sup>st</sup> Assist (Surgeon)</b>	<b># Patients Followed (Physician)</b>		
	<b>Start</b>	<b>End</b>					<b>Pre</b>	<b>Peri</b>	<b>Post</b>
<b>Fellowship Training</b>									
<b>Experience Post Fellowship</b>									



- h) Training/Experience: List how the physician fulfills the criteria for participating as an observer of procurements and transplants. For procurements, the physician must have observed the evaluation, donation process, and management of the donors. **This table is only applicable if you are applying as a primary transplant physician.**

Date From - To (MM/DD/YY)	Transplant Hospital	# of Procurement s Observed	# of Transplants Observed

- i) Describe in detail the proposed primary physician's level of involvement in **this** transplant program as well as **prior** training and experience **under all organs**. **Then also complete the organ specific section for which you are applying through (heart, lung, kidney, liver, pancreas, or intestine).**

Describe Level of Involvement in <u>This</u> Transplant Program	Describe <u>Prior</u> Training/Experience	
<b>All Organs</b>		
Donor Selection		
Recipient Selection		
Transplant Surgery (surgeon only)		
Pre-operative management/care of patients with acute, chronic disease or end stage organ failure		
Long term outpatient follow-up care		
Immunosuppressive therapy including side effects of drugs and complications of		

immunosuppressive		
Histological interpretation and grading of allograft biopsies for rejection		
Fluid and electrolyte management (peds only)		
Effects of transplantation and immunosuppressive agents on growth and development (peds only)		
Manifestation of rejection in the pediatric patient (peds only)		
<b>Heart, Lung</b>		
Use of mechanical circulatory support devices/ cardiopulmonary bypass		
Pre-operative hemodynamic/ ventilator care		
Post-operative hemodynamic/ ventilator care		
<b>Kidney, Liver, Pancreas, Intestine</b>		
Differential diagnosis of organ dysfunction in the allograft recipient		
Histocompatibility and tissue typing		
Interpretation of ancillary tests for organ dysfunction		

**Table 6: Primary Physician - Transplant Log (Sample)**  
**Only complete this table if applying as the primary VCA transplant physician by qualifying as a primary transplant surgeon.**

<b>Organ:</b>	
<b>Name of proposed primary surgeon:</b>	
<b>Name of hospital where transplants were performed:</b>	
<b>Date range of surgeon's appointment/training:</b> MM/DD/YY to MM/DD/YY	

List cases in date order. Extend lines on log as needed. Patient ID should not be name or Social Security Number.

#	Date of Transplant	Medical Record/ OPTN ID #	Primary Surgeon	1 <sup>st</sup> Assistant
1				
2				
3				
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<b>Director's Signature</b>	<b>Date</b>
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<b>Print Name</b>	
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**Table 7: Primary Physician - Procurement Log (Sample)**  
**Only complete this table if applying as the primary VCA transplant physician by qualifying as a primary transplant surgeon.**

<b>Organ:</b>	
<b>Name of proposed primary surgeon:</b>	

List cases in date order. Add rows as needed. Patient ID should not be name or Social Security Number.

#	Date of Procurement	Donor ID Number	Comments (LD/CAD/Multi-Organ)
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			

2			
4			
2			
5			
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6			
2			
7			
2			
8			
2			
9			
3			
0			

<b>Director's Signature</b>	<b>Date</b>
<b>Print Name</b>	

**Table 8: Primary Physician - Recipient Log (Sample)**  
 Only complete this table if applying as the primary VCA transplant physician by qualifying as a primary transplant physician.

<b>Organ:</b>	
<b>Name of proposed primary physician:</b>	
<b>Name of transplant hospital where transplants were performed:</b>	
<b>Date range of physician's appointment/training:</b> MM/DD/YY to MM/DD/YY	

List cases in date order. Add rows as needed. Patient ID should not be name or Social Security Number.

#	Date of Transplant	Medical Record/ OPTN ID #	Pre-Operative	Peri-Operative	Post-Operative	Comments
1						
2						
3						
4						
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10						

1						
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2						
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3						
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<b>Director's Signature</b>	<b>Date</b>
<b>Print Name</b>	

**Table 9: Primary Physician - Observation Log (Sample)**  
**Only complete this table if applying as the primary VCA transplant physician by qualifying as a primary transplant physician.**

<b>Organ:</b>	
<b>Name of proposed primary physician:</b>	

In the tables below, document the physician’s participation as an observer in transplants and procurements. For procurements, the physician must have observed the evaluation, donation process, and management of the donors.

List cases in date order. Add rows as needed. Patient ID should not be name or Social Security Number.

**Transplants Observed**

#	Date of Transplant	Medical Record/ OPTN ID #	Living Donor or Deceased	Recipient Age	Hospital
1					
2					
3					
4					
5					

**Procurements Observed**

#	Date of Procurement	Medical Record/ OPTN ID #	Living Donor or Deceased
1			
2			
3			
4			
5			

**Part 3C, Section 2: Personnel - Additional Physician(s)**

**Complete this section of the application to describe physicians involved in the program that are not designated as primary, but are credentialed by the transplant hospital to provide transplant services and be able to independently manage the care of transplant patients. Duplicate this section as needed.**

1. Identify the additional physician:

Name:

a) Provide the following dates (use MM/DD/YY):

Date of employment at this hospital:

b) Does the physician have FULL privileges at this hospital? (check one)

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

If the physician does **not** currently have full privileges:

Date full privileges to be granted (MM/DD/YY):   
 Explain the physician's current credentialing status, including any limitations on practice:

c) How much of the physician's professional time is spent on site at this hospital?

Percentage of professional time on site:   
 Number of hours per week:

d) How much of the physician's professional time is spent on site at other facilities (hospitals, health care facilities, and medical group practices)?

Facility Name	Type	Location (City, State)	% Professional Time On Site

e) List the physician's current board certification(s) below. If board certification is pending, indicate the date the exam has been scheduled. If the physician has been recertified, use that date. Also provide a copy of the certification(s).

Board Certification Type	Certification Effective Date/ Recertification Date (MM/DD/YY)	Certification Valid Through Date (MM/DD/YY)	Certificate Number



Department of Health and Human Services

OMB No. 0915-0184

Health Resources and Services Administration

Expiration Date: XX/XX/XXXX

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**Table 10: Certificate of Investigation**

1. List all transplant surgeons and physicians currently involved in the program.
  - a) This hospital has conducted its own peer review of all surgeons and physicians listed below to ensure compliance with applicable OPTN/UNOS Bylaws. Expand rows as needed.

Names of Surgeons

Names of Physicians

- b) If prior transgressions were identified, has the hospital developed a plan to ensure that the improper conduct is not continued?

Yes	
No	
Not Applicable	

If yes, what steps are being taken to correct the prior improper conduct or to ensure the improper conduct is not repeated in this program? Provide a copy of the plan.

I certify that this review was performed for each named surgeon and physician according to the hospital's peer review procedures.

<b>Signature of Primary Surgeon</b>	<b>Date</b>
<b>Print Name</b>	
<b>Signature of Primary Physician</b>	<b>Date</b>
<b>Print Name</b>	

**Table 11: Program Coverage Plan**

1. **Provide a copy of the current Program Coverage Plan** and answer the questions below. The program coverage plan must be signed by either the:
  - a. OPTN/UNOS Representative; or
  - b. Program Director(s); or
  - c. Primary Surgeon and Primary Physician.

	<b>Ye s</b>	<b>N o</b>
Is this a single surgeon program?		
Is this a single physician program?		
<i>If single surgeon or single physician, submit a copy of the patient notice or the protocol for providing patient notification.</i>		
Does this transplant program have transplant surgeon(s) and physician(s) available 365 days a year, 24 hours a day, 7 days a week to provide program coverage?		
<i>If the answer to the above question is "No," an explanation must be provided that justifies why the current level of coverage should be acceptable to the MPSC. Please use the additional information section below.</i>		
Transplant programs shall provide patients with a written summary of the Program Coverage Plan at the time of listing and when there are any substantial changes in program or personnel. Has this program developed a plan for notification?		
Is a surgeon/physician available and able to be on the hospital premises to address urgent patient issues?		
Is a transplant surgeon readily available in a timely manner to facilitate organ acceptance, procurement, and implantation?		
A transplant surgeon or transplant physician may not be on call simultaneously for two transplant programs more than 30 miles apart unless circumstances have been reviewed and approved by the MPSC. Is this program requesting an exemption?		
If yes, provide explanation:		
Unless exempted by the MPSC for specific causal reasons, the primary transplant surgeon/primary transplant physician cannot be designated as the primary surgeon/primary transplant physician at more than one transplant hospital unless there are additional transplant surgeons/transplant physicians at each of those facilities. Is this program requesting an exemption?		
If yes, provide explanation:		
Additional information:		